

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

LUIS ARANA SANTIAGO

Plaintiff

v.

Luis Tapia Maldonado, in his personal capacity;
José Heredia Rodríguez; Vivian Vélez Vera;
Marisol Díaz Ocasio

Defendants

Civil Case No. 19-02128 (SCC)

Re: Constitutional Rights
Torts

MOTION TO CONTINUE DEADLINE
TO FILE ANSWER AND/OR TO OTHERWISE PLEAD

TO THE HONORABLE COURT:

COME NOW co-defendants Luis Tapia Maldonado, José Heredia Rodríguez and Marisol Díaz Ocasio, thorough the undersigned attorneys, and, without waiving any defenses or submitting to the jurisdiction of this Honorable Court, request an extension of time to file an answer or otherwise plead as follows:

1. On February 27 and February 28, 2020, Plaintiff notified a copy of the Complaint.
2. Inasmuch as the claims in the Complaint are related to the performance of their duties as employees of the University of Puerto Rico (“UPR”), appearing defendants submitted the Complaint to the attention of the UPR for consideration as to legal representation and payment of judgment pursuant to Law 9 of November 26, 1975 amendments to Law 104 of June 29, 1955, PR Laws Ann tit 32, §3077 et seq.
3. Due to COVID-19 lockdown restrictions established by the Governor of Puerto Rico, the process related to appearing co-defendants’ Law 9 request has not been completed.

4. The undersigned attorney has been assigned by the UPR to assume legal representation of the appearing co-defendants, subject to the completion of Law 9 approval proceedings.

5. Due to the lockdown restrictions in place, the undersigned attorney has not been able to obtain the necessary information from the appearing defendants in order to draft a responsive pleading.

6. In light of the above, the appearing defendants request this Honorable court to continue the deadline for the answer to the complaint until thirty days after the lockdown measures related to COVID-19 are lifted.

WHEREFORE, the appearing defendants respectfully request this Honorable court to continue the deadline for the answer to the complaint until thirty days after the lockdown measures related to COVID-19 are lifted.

RESPECTFULLY SUBMITTED.

IT IS HEREBY CERTIFIED that on this same date, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the other parties.

In San Juan, Puerto Rico this 23^d day of April 2020.

NOLLA, PALOU & CASELLAS, LLC

PO Box 195287

San Juan, PR 00919-5287

Tel. 787-625-6535

Fax. 787-625-6530

s/Juan M. Casellas-Rodríguez

Juan M. Casellas-Rodríguez

USDC-PR No. 216701

jmc@npclawyers.com